

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: _____) Chapter 11
)
BIG LOTS, INC., et al.,) Case No. 24-11967 (JKS)
)
 Debtors.¹) (Jointly Administered)
)
) Re: _____

**[PROPOSED] ORDER GRANTING MOTION OF JOHN FLORENCE AND
GRANTING RELIEF FROM THE AUTOMATIC STAY**

AND NOW THIS _____ day of _____ 2024, upon consideration of the *Motion of John Florence for Order Granting Relief From The Automatic Stay* (the “Motion”), the Court having determined that good and adequate cause exists for approval of the Motion, and the Court having determined that no further notice of the Motion is necessary,

IT IS ORDERED:

1. That the Motion is GRANTED as set forth herein; and
2. The automatic stay of 11 U.S.C. § 362(a) of the Bankruptcy Code is immediately lifted and Movant may pursue recovery for the Indiana Cause of Action, may initiate and prosecute litigation thereon, and shall be permitted to proceed to adjudication; and
3. That Movant shall be entitled to liquidate and satisfy to judgment or other resolution granted, if any, from applicable insurance coverage available to the Debtors; and
4. To the extent that insurance proceeds are unavailable, or insufficient, Movant will return to this Court for disposition of her claim; and

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin - Granville Road, Columbus, OH 43081.

5. Nothing in this order shall prevent the Movant from engaging with Debtors in settlement negotiations and/or an ADR process or other means of resolution to be offered by Debtors or otherwise permitted by the Court; and

6. This Order does not prevent Movant from seeking further relief from the automatic stay in connection with the New Jersey Court Action or otherwise; and

7. Relief from the automatic stay shall be effective immediately upon entry of this Order and the 14 day stay provided in Bankruptcy Rule 4001(a)(3) shall not apply; and

8. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and enforcement of this Order.